

Flight and Duty time 121.471 needs and overhaul. A complete rewrite or rewording of existing FAR should be done to enhance safety of flight and support flight crews in the effort of safety. Currently pilots are allowed to fly duty days of up to 16 hours and however many flight hours (there is a loophole in the restriction of actual flight hours, being that a carrier only has to show that a crew has been only scheduled for 8 or less flight hours), park and airplane at the overnight destination and legally be back in the seat exactly 8 hours later under the current regulation called reduced rest. Eight hours of "rest" does not truly exist, because of the time it takes to get to hotels, meals, and security.

The rule should only allow this practice as a relief from unanticipated delays (here is another gray area) occasionally not on the scheduled basis as it is done now. Some carriers are scheduling 14-15 hours of duty time and the crew ends up flying 8-9 actual flight hours, and are expected to be in the airplane 8 hours later on a continual basis. The rule also requires a "compensatory rest" period of at least 10 within 24 hours, however I believe again that intent of the rule was not to have scheduled reduced rest especially on a continual basis. The damage could already be done before the "compensatory rest" in the flying immediately after the reduced rest.

NASA has research that shows that rest is crucial to top performance of flight crews, and has strongly suggested changes to regulations and scheduling practices to acknowledge the natural human limits with regard to rest/sleep and safety.

I propose the following changes:

Normal scheduled minimum rest of 10 hours.

Reduced rest only for when there are weather/ATC delays beyond the carriers control (here is another area abused and open for interpretation, but some carriers will reduce rest for mechanical situations which I do not consider beyond their control because of improper utilization of spare airplanes, spare parts, and MEL lists), and not to be allowed on a scheduled basis. Reduced should not be allowed in a situation where the crew has had a very long duty period over 12 hours and extensive flight time. I also would like to see the regulation changed to prevent a crew from flying after a weather divert after a long duty period under the "legal to start legal to finish" banner.

The flight time limits should be changed as well:

8 in 24 hours
30 in 7 days
100 per calendar month

No annual limit as this should help with the schedule restrictions imposed by the new rest requirements.

Thanks